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*Attorneys for JBED Ventures, LLC d/b/a Century Turbine Repair, LLC*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

COLSTRIP ENERGY LP, a Montana  
Limited Partnership,

Plaintiff,

v.

JBED VENTURES, LLC d/b/a  
CENTURY TURBINE REPAIR, LLC, a  
Missouri Limited Liability Company,

Defendant.

Case No. \_\_\_\_\_

**NOTICE OF REMOVAL**

Defendant JBED Ventures, LLC d/b/a Century Turbine Repair, LLC, a Missouri Limited Liability Company (“JBED”) hereby removes Cause Number DV-18-39, *Colstrip Energy LP, a Montana Limited Partnership v. JBED Ventures, LLC d/b/a Century Turbine Repair, LLC, a Missouri Limited Liability Company*, from the Montana Sixteenth Judicial District Court, Rosebud County,

pursuant to 28 U.S.C. §§ 1332 and 1441. Removal of this action is proper because the amount in controversy exceeds \$75,000.00 and there is complete diversity between Plaintiff and Defendant.

**I. Removal is Timely**

Plaintiff's Complaint and Jury Demand ("Complaint") was initially filed on August 17, 2018. *See* Complaint, attached hereto as Exhibit A. JBED was served with the Complaint on August 24, 2018. This notice of removal is filed within the thirty days of the filing of the Complaint; therefore, removal is timely. 28 USC § 1446(b)(1).

**II. Venue**

Venue for removal is proper in this district and division because this district and division embrace the Sixteenth Judicial District Court, Rosebud County, Montana, which is the forum in which the removed action is pending. 28 U.S.C. § 1441(a).

**III. Diversity Jurisdiction**

There is diversity jurisdiction in this Court because there is complete diversity of citizenship and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs. 28 U.S.C. § 1332.

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**IV. Notice to State Court and Opposing Party**

Pursuant to 28 U.S.C. § 1446(d) and L.R. 3.3(a), JBED will promptly give Plaintiff written notice of the filing of this Notice of Removal and will promptly file a copy of this Notice of Removal with the Clerk of the Sixteenth Judicial District, Rosebud County, Montana, where the action is pending.

**V. Conclusion**

For the above stated reasons, JBED respectfully requests that the above described case be removed from the Sixteenth Judicial District Court, Rosebud County, Montana, to the United States District Court for the District of Montana.

DATED this 14th day of September, 2018.

BROWNING, KALECZYC, BERRY & HOVEN, P.C.

By /s/M. Christy S. McCann

Oliver H. Goe

M. Christy S. McCann

*Attorneys for JBED Ventures, LLC d/b/a Century  
Turbine Repair, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of September, 2018, a true copy of the foregoing was served:

Via ECF to the following parties:

Trent M. Gardner  
Goetz, Baldwin & Geddes, P.C.  
P.O. Box 6580  
Bozeman, MT 59771-6580

/s/ M. Christy S. McCann  
BROWNING, KALECZYC, BERRY & HOVEN, P.C.